



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

DMP  
F. #2014R01413

*271 Cadman Plaza East  
Brooklyn, New York 11201*

August 9, 2019

By ECF (without enclosures) and for Pickup (with enclosures)

Elizabeth E. Macedonio, Esq.  
40 Fulton Street, 23rd Floor  
New York, New York 10038  
*Counsel for defendant Kasimov*

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By ECF (without enclosures) and Federal Express (with enclosures)

Lawrence M. Stern, Esq.  
100 Hudson Street, Ste. 6A  
New York, New York 10013  
*Counsel for defendant Rakhmatov*

Re: United States v. Azizjon Rakhmatov and Dilkhayot Kasimov  
Criminal Docket No. 15-95 (WFK)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes additional discovery with respect to the above-referenced case. The enclosed discovery is being produced pursuant to the Stipulations and Protective Orders entered by the Court with respect to each defendant.<sup>1</sup> The government also renews its requests for reciprocal discovery.

The government hereby discloses the following materials:

- Statements made by co-defendant Abdurasul Juraboev to law enforcement officers on August 15 and August 18, 2014, bearing Bates numbers AJ 000001 to AJ 000017;

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<sup>1</sup> See Orders dated May 5, 2015 (ECF No. 55-2, as to defendant Kasimov); June 29, 2015 (ECF No. 88, as to defendant Kasimov); June 27, 2016 (ECF No. 154, as to defendant Rakhmatov); and October 3, 2017 (ECF No. 233, as to defendant Rakhmatov).

- Surveillance photographs taken at John F. Kennedy International Airport on the evening of February 24, 2015, depicting, among other individuals, defendant Kasimov, bearing Bates numbers DK-AR 000001 – DK-AR 000002;
- Photographs taken during a consensual search of defendant Kasimov’s apartment on or about February 25, 2015, bearing Bates numbers DK-AR 000003 – DK-AR 000012;
- Copies of certain documents recovered from the search of defendant Kasimov’s apartment on or about February 25, 2015; bearing Bates numbers DK-AR 000013 – DK-AR 000024.

In addition, the government hereby provides defendant Kasimov with a hard drive containing forensic copies of an LG Flex phone (which was originally produced on May 19, 2017 and is being re-produced at the request of Kasimov's counsel), as well as forensic copies of other electronic devices seized from Kasimov's person or residence on or about February 25, 2015.

In addition to the electronic devices, the government also seized from Kasimov and/or his residence three used Apple gift cards, an address book, keys, miscellaneous paperwork, receipts, ten bank credit cards, two Best Buy gift cards, one black colored wallet, one large black National Tourist rolling suitcase (containing miscellaneous contents), and \$12,032 in cash. These items are available for inspection.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
Douglas M. Pravda  
David K. Kessler  
J. Matthew Haggans  
Assistant United States Attorneys  
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Cc: Clerk of Court (WFK) (by ECF) (without enclosures)